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3900
Chicago, IL 60601
T 312.985.5900
F 312.985.5999

July 23, 2021

Attorney General Wayne Stenehjem
Office of the Attorney General
Consumer Protection and Antitrust Division
1050 E Interstate Avenue, Suite 200
Bismarck, ND 58503

Dear Attorney General Stenehjem:

We represent Secure Administrative Solutions, LLC ("SAS") with respect to a data security incident involving the potential exposure of certain personally identifiable information ("PII") described in more detail below. SAS is a third-party administrator and claims processing service provider located in Salt Lake City, Utah. SAS offers is providing this notice on behalf of the entities listed in Exhibit A. SAS is committed to answering any questions you may have about the data security incident, its response, and steps taken to prevent a similar incident in the future.

1. Nature of security incident.

On April 18, 2021, SAS identified suspicious network activity when they were unable to log-in to certain applications and systems. Under the direction of Outside Counsel, SAS engaged an independent computer forensics firm to assist with determining what had occurred, the extent of any unauthorized access, and whether any data, including PII, was compromised. The investigation determined that SAS had suffered a ransomware attack, but did not identify any evidence of data being taken from the network until May 25, 2021. Further investigation determined that information including names, addresses, dates of birth, telephone numbers, Medicare Supplement insurance policy numbers, and other administrative policy information for the entities listed in Exhibit A may have been impacted. For a limited number of individuals, Social Security numbers may have also been impacted. SAS notified the entities listed in Exhibit A on June 1, 2021.

2. Number of residents affected.

Two thousand one hundred forty-five (2145) North Dakota residents may have been affected and were notified of the incident. A notification letter was sent to the potentially affected individuals on July 23, 2021 (a copy of the form notification letter is enclosed).

3. Steps taken or plan to take relating to the incident.

July 23, 2021

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SAS took steps to address this incident and prevent similar incidents in the future. SAS contacted law enforcement and is cooperating with their investigation, restored servers from clean backups, enforced a system wide global password reset, and implemented stricter password complexity requirements. SAS also provided all users with new personal computers and training on updated network security protocols and procedures. Finally, for the limited number of impacted individuals whose Social Security numbers, they are able to enroll in 12 months of credit monitoring and identity restoration services at no cost.

4. Contact information.

SAS takes the security of the information in its control seriously and is committed to ensuring this information is appropriately protected. If you have any questions or need additional information, please do not hesitate to contact me at mventrone@clarkhill.com or (312) 360-2506.

Very truly yours,

CLARK HILL

A handwritten signature in black ink, appearing to read 'M K Ventrone', with a horizontal line extending to the right.

Melissa K. Ventrone
Partner

Enclosure

Exhibit A – ND	2145
Sentinel Security Life	2145



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

July 23, 2021



G6261-L01-0000001 T00001 P001 *****SCH 5-DIGIT 32808

SAMPLE A. SAMPLE - L01 NOSSN

APT ABC

123 ANY ST

ANYTOWN, ST 12345-6789



[Title of Letter]

Dear Sample A. Sample:

We wanted to let you know about a data security incident experienced by Secure Administrative Solutions, LLC ("SAS") that potentially impacted a limited amount of your personal information including your name and Medicare Supplement insurance policy number. SAS provides third-party administrator and claims processing services to [Company Name] and may have your information if you received an insurance policy from [Company Name]. We want to assure you that we take the privacy and security of your information very seriously, and sincerely apologize for any concern or inconvenience this incident may cause you. This letter contains information about steps you can take to protect your information and resources we are making available to help you.

What happened?

On April 15, 2021, we experienced unusual computer activity on our IT systems and were unable to access certain portions of the systems across our network. We immediately began an investigation and engaged independent computer forensic experts to assist. On May 25, 2021, SAS learned that a limited amount of your information may have been taken from our environment during the incident. This incident was limited to SAS' systems and did not impact any other company's system.

What information was involved?

From our review, it appears that your name, address, date of birth, telephone number, Medicare Supplement insurance policy number and other administrative policy information may have been impacted. Your Social Security number and financial information were not impacted by this incident.

0000001



G6261-L01

What we are doing?

We want to assure you that we had implemented systems to prevent this kind of event and have now taken additional steps to avoid this kind of event from happening in the future. We restored servers from clean backups, enforced a system wide global password reset, implemented stricter password complexity requirements, and provided all users with new personal computers and training on updated network security protocols and procedures. We also contacted law enforcement and are cooperating with their investigation.

What you can do?

While we believe it unlikely that any of your information will be misused, it is always a good idea to review your benefits statement for any suspicious activity. You can also visit <https://www.consumer.ftc.gov/topics/privacy-identity-online-security> for more information on how to protect yourself online.

For more information.

If you have any questions or concerns, please call (855) 797-1162 Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B016454. Your trust is a top priority for us, and we deeply regret any inconvenience or concern that this matter may cause you.

Sincerely,



Janelle Boudrero
President
Secure Administrative Solutions

U.S. State Notification Requirements

For residents of Hawaii, Michigan, Missouri, New Mexico, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Colorado, Illinois, Iowa, Maryland, Missouri, New Mexico, North Carolina, Oregon, Washington, and West Virginia: It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Equifax

P.O. Box 105139
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 6790
Fullerton, CA 92834
1-800-916-8800
www.transunion.com

You may also obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of Iowa: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Colorado, Maryland, Illinois, North Carolina, and Rhode Island: You can obtain information from the Maryland, North Carolina, and Rhode Island Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Attorney General

Consumer Protection Div.
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

North Carolina Attorney General

Consumer Protection Div.
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Rhode Island Attorney General

Consumer Protection Div.
150 South Main Street
Providence, RI 02903
(401) 274-4400
www.riag.ri.gov

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Avenue,
NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/idtheft

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of California: You may also wish to review the information provided by the California Attorney General at <https://oag.ca.gov/idtheft>.

For residents of District of Columbia: You may obtain information about avoiding identity theft from the Office of the Attorney General for the District of Columbia by visiting <https://oag.dc.gov/consumer-protection>, emailing consumer.protection@dc.gov, calling (202) 442-9828, or mailing Office of the Attorney General, Office of Consumer Protection, 400 6th Street, NW Washington, DC 20001.

For residents of New York: You may obtain additional information about security breach response and identity theft prevention and protection from the New York State Office of the Attorney General at <https://ag.ny.gov/> or by calling 1-800-771-7755; the New York State Police at <http://troopers.ny.gov/> or by calling 1-518-457-6721; and/or the New York Department of State at <https://www.dos.ny.gov> or by calling 1-800-697-1220.

For residents of Oregon: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General at <https://doj.state.or.us>, by calling (877) 877-9392, or writing to Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.

For residents of all states: More information can also be obtained by contacting the Federal Trade Commission listed above.

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via each credit bureau's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three credit bureaus is below. As of September 21, 2018, fraud alerts will now last one year, instead of 90 days. Fraud alerts will continue to be free and identity theft victims can still get extended fraud alerts for seven years.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, each credit reporting agency has a dedicated web page for security freezes and fraud alerts or you can request a freeze by phone or by mail. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request may also require a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. Effective September 21, 2018, placing a freeze on your credit report is now free for all United States citizens.

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

Experian

P.O. Box 9554
Allen, TX 75013-9554
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016-2000
1-888-909-8872
www.transunion.com/credit-freeze

0000001





Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

July 23, 2021

G6261-L02-0000002 T00001 P001 *****SCH 5-DIGIT 32808



SAMPLE A. SAMPLE - L02 SSN
APT ABC
123 ANY ST
ANYTOWN, ST 12345-6789



[Title of Letter]

Dear Sample A. Sample:

We wanted to let you know about a data security incident experienced by Secure Administrative Solutions, LLC (“SAS”) that potentially impacted a limited amount of your personal information, including your name and Social Security number. SAS provides third-party administrator and claims processing services to [Company Name] and may have your information if you act as an agent of [Company Name]. We want to assure you that we take the privacy and security of your information very seriously, and sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to protect your information and resources we are making available to help you.

What happened?

On April 15, 2021, we experienced unusual computer activity on our IT systems and were unable to access certain portions of the systems across our network. We immediately began an investigation and engaged independent computer forensic experts to assist. On May 25, 2021, SAS learned that a limited amount of your information may have been taken from our environment during the incident. SAS informed [Company Name] of the incident on June 1, 2021.

What information was involved?

From our review, it appears that your name, address, Social Security number, and agent license number may have been impacted.

0000002



G6261-L02

What we are doing?

We want to assure you that we had implemented systems to prevent this kind of event and have now taken additional steps to avoid this kind of event from happening in the future. We restored servers from clean backups, enforced a system wide global password reset, implemented more strict password complexity requirements, and provided all users with new personal computers and training on updated network security protocols and procedures. We also contacted law enforcement and are cooperating with their investigation. In addition, to help protect your identity, we are offering a complimentary [## months] membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. Instructions on how to enroll are provided below.

What you can do?

While we believe it unlikely that any of your information will be misused, it is always a good idea to review your benefits statement for any suspicious activity. You can also visit <https://www.consumer.ftc.gov/topics/privacy-identity-online-security> for more information on how to protect yourself online.

To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: October 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (855) 797-1162 by October 31, 2021. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [## months] EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (855) 797-1162. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

For more information.

If you have any questions or concerns, please call (855) 797-1162 Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number ENGAGE#. Your trust is a top priority for us, and we deeply regret any inconvenience or concern that this matter may cause you.

Sincerely,



Janelle Boudrero
President
Secure Administrative Solutions



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www.equifax.com

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742

www.experian.com

TransUnion

P.O. Box 6790
Fullerton, CA 92834
1-800-916-8800

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www.oag.state.md.us

North Carolina Attorney General

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Raleigh, NC 27699-9001
1-877-566-7226

www.ncdoj.com

Rhode Island Attorney General

Consumer Protection Div.
150 South Main Street
Providence, RI 02903
(401) 274-4400

www.riag.ri.gov

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Avenue,
NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)

www.ftc.gov/idtheft

For residents of Rhode Island: It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident. There is one Rhode Island resident[s] impacted by this incident.

For residents of California: You may also wish to review the information provided by the California Attorney General at <https://oag.ca.gov/idtheft>.

For residents of District of Columbia: You may obtain information about avoiding identity theft from the Office of the Attorney General for the District of Columbia by visiting <https://oag.dc.gov/consumer-protection>, emailing consumer.protection@dc.gov, calling (202) 442-9828, or mailing Office of the Attorney General, Office of Consumer Protection, 400 6th Street, NW Washington, DC 20001.

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Atlanta, GA 30348-5788
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Allen, TX 75013-9554
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

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Chester, PA 19016-2000
1-888-909-8872
www.transunion.com/credit-freeze